

**To:** thompson, rachel[e]thompson.rachelle@epa.gov]  
**Cc:** James Holland[jimh@levinterminal.com]  
**From:** Scott Bourne  
**Sent:** Wed 3/5/2014 4:59:03 PM  
**Subject:** Re: LRT Annual Report

Dear Ms. Thompson,

Yes, I think I can answer these questions easily. In answer to your first question, the City of Richmond will no longer allow discharge of storm water to the sanitary sewer. The City has applied this requirement to Richmond industrial dischargers over the past 1-2 years.

For your second question, we believe that the sediment collected in the interceptors is predominantly bulk product handled at the marine terminal. This month, we expect to collect sediment samples from the interceptors in the Upland Cap Area (SW4 to SW7) for pesticide analysis. We will include this information in 2013-2014 Annual O&M Report.

Please let us know if you have any additional questions.

Have a good day,

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>>> "thompson, rachel[e]thompson.rachelle@epa.gov> 3/3/2014 5:15 pm >>>  
Hello Mr. Bourne,

EPA's contractor CH2MHill had two questions regarding the 2012-2013 Annual Report you provided:

1. Section 2.4 states "Storm water discharged to the tanks and was allowed to settle before it was reused on-site for dust suppression and surface cleaning, or before it was tested and discharged to the sanitary sewer under an Industrial Storm Water, Wastewater Discharge Permit from the City. Beginning in the 2013-2014 storm water season, storm water discharges to the municipal sanitary sewer will no longer be permitted." Does this mean that stormwater will no longer be allowed to discharge to the sanitary sewer, or that discharges will continue but will no longer need a permit?

2. Section 3.3 indicates that up to 18 inches of sediment were removed from the stormwater interceptors. The sediments were removed, dried on-site, and returned to the material stockpiles, which were assumed to be the source of the sediment. Have you ever tested the accumulated sediment to verify that it is from the stockpiles and not some source of DDT-contaminated material, especially since it is being returned to the site?

I hope that these will be relatively straightforward to answer, but please let me know if you have any questions.

Thank you,

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